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MEMO ENDORSED

March 30, 2020

VIA ECF

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square, Room 619 New York, New York 10007 The application is GRANTED. The parties are directed to inform the Court within 45 days whether it may close the case.

Edgardo Ramos, U.S.D.J Dated: April 9, 2020 New York, New York

Re: Reid v. Robert Clergerie America, Inc.: Case No. 1:19-cv-7967-ER

Dear Judge Ramos:

We represent defendant Robert Clergerie America, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Valentin Reid, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from March 30, 2020 to May 14, 2020.

The requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

cc: All counsel of record (by ECF)